

STATE OF MARYLAND \* NO. C-10-CR-23-000516  
v. \* IN THE CIRCUIT COURT FOR  
RUBEN ALONSO HERNANDEZ-LAINEZ\* CM  
FREDERICK COUNTY, MD

\* \* \* \* \*

**STATE'S REQUEST FOR DISCOVERY**

The State of Maryland, by Tammy M. Leache, Assistant State's Attorney for Frederick County, Maryland, and requests that the following Discovery be provided by the Defendant, in accordance with Maryland Rule of Procedure 4-263 (e):

Disclosure by Defense:

**1. Defense Witness**

Please provide the full legal name (first, middle, last and suffix) and, the address of each defense witness other than the Defendant, together with all written statements of each such witness that relate to the subject matter of the testimony of that witness.

**2. Reports and Statements of Experts**

As to each defense witness the defense intends to call to testify as an expert witness, that the Defendant provide:

(A) the expert's full legal name (first, middle, last and suffix) and address, the subject matter on which the expert is expected to testify, the substance of the findings and the opinions to which the expert is expected to testify, and a summary of the grounds for each opinion;

(B) the opportunity to inspect and copy all written reports or statements made in connection with the action by the expert, including the results of any physical or mental examination, scientific test, experiment, or comparison; and

(C) the substance of any oral report and conclusion by the expert.

### **3. Character Witnesses**

As to each defense witness the defense intends to call to testify as to the Defendant's veracity or other relevant character trait, that the Defendant provide the full legal name (first, middle, last and suffix) and, the address of that witness.

### **4. Alibi Witnesses**

If the State's Attorney has designated the time, place, and date of the alleged offense, that the Defendant provide the full legal name (first, middle, last and suffix) and, the address of each person other than the Defendant whom the defense intends to call as a witness to show that the Defendant was not present at the time, place, or date designated by the State's Attorney.

### **5. Insanity Defense**

That the Defendant provide notice of any intention to rely on a defense of not criminally responsible by reason of insanity, the full legal name (first, middle, last and suffix) and, the address of each defense witness other than the Defendant in support of that defense.

### **6. Documents, Computer-generated Evidence, and Other Things**

That the State be provided the opportunity to inspect, copy and photograph any documents, computer-generated evidence as defined in Rule 2-504.3 (a), recordings, photographs, or other tangible things that the defense intends to use at a hearing or at trial.

### **7. Person of the Defendant**

#### **(1) On Request**

On request of the State's Attorney that includes reasonable notice of the time and place, the Defendant shall appear for the purpose of:

- (A) providing fingerprints, photographs, handwriting exemplars, or voice exemplars;
- (B) appearing, moving or speaking for identification in a lineup; or

(C) trying on clothing or other articles.

**(2) On Motion**

On Motion filed by the State's Attorney, with reasonable notice to the defense, the court, for good cause shown, shall order the Defendant to appear and (A) permit the taking of buccal samples, samples of other materials of the body, or specimens of blood, urine, saliva, breath, hair, nails, or material under the nails or (B) submit to a reasonable physical or mental examination.

Tammy M. Leache /s/  
TAMMY M. LEACHE  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 12th day of July, 2023 a copy of the foregoing State's Request for Discovery was sent via MDEC and/or Sharefile/Citrix, a secure file sharing service, to the designated e-mail address and/or service contact for Rachel Reyes, Esquire, Attorney for Defendant herein.

Tammy M. Leache /s/  
TAMMY M. LEACHE  
ASSISTANT STATE'S ATTORNEY